

# Working with a Drug Disposal Company

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# Why are these programs needed?



# Working with a drug disposal company



# Regulatory Framework

- Hazardous Waste Rules: RCRA
  - Listed Wastes
    - Examples: Cyclophosphamide, Mitomycin C, Nitroglycerin, Epinephrine
  - Characteristic Wastes
    - Ignitability (i.e.: alcohol based medications)
    - Corrosivity
    - Reactivity (i.e.: aerosol based medications)

# Regulatory Framework

- Nonhazardous Waste
  - Liquids: Regulated in Michigan under Act 451, Part 121.
  - Solids: Non-regulated

## Regulatory Framework

# Universal Waste

- Batteries
- Fluorescent Light Bulbs
- Pesticides
- Electronics
- Pharmaceuticals (Michigan)



Household Hazardous Waste

# Regulatory Framework

## Household Hazardous Waste

- ~~Hazardous Waste Rules: RCRA~~
- ~~Universal Waste Laws; and~~
- ~~Michigan Act 451, Part 121 (Liquid Industrial Waste)~~

Why did I explain all  
these regulations?

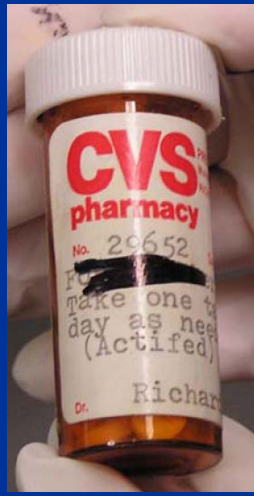
## Regulatory Framework

# Non-Household Waste Sources

- Nursing Homes
- Hospitals
- Pharmacies
- Other Businesses

# Regulatory Framework

## DEA Controlled Substances (Schedule I-V)



## Regulatory Framework

# Registrant – to – Registrant Transfer

- Manufacturers
- Distributors
- Scientific & Healthcare Professionals
- Reverse Distributors

# Regulatory Framework

Registrant – to – Consumer = YES

Consumer – to – Registrant = NO

# Planning Your Collection

**Controlled Substances?**

**Mercury?**

**Sharps?**

**Economical &  
Environmentally  
Correct Disposal Of  
ALL Materials  
Collected**

# Choosing a disposal company

# **Request for Proposal (RFP)**

## **The Contract**

# Specify the pricing structure...



Comparing  
Apples to Apples

# Pricing Pitfalls

## Illustration #1:

Vendor #1:  
\$2.11 / Pound

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Vendor #2  
\$420 / 55 gallon Drum

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Vendor #3  
\$10 / Participant

# Pricing Pitfalls

## Illustration #2:

### Vendor #1:

\$2 / lb. .... Liquids

\$1 / lb. .... Solids

\$5 / lb. .... Aerosols

\$75 / man hour (on site)

\$500 Stop Charge

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### Vendor #2

\$5 /lb. .... All pharmaceuticals  
(Inclusive)



**Will waste be  
minimized?**

**Specify the desired  
disposal technology...**

**Economical & Environmentally  
Correct Disposal Of ALL Materials  
Collected**

# Pre-Event Considerations

**Where should you  
have the collection?**

**Indoors or covered**

**With accessible electricity**

**Hard surface**

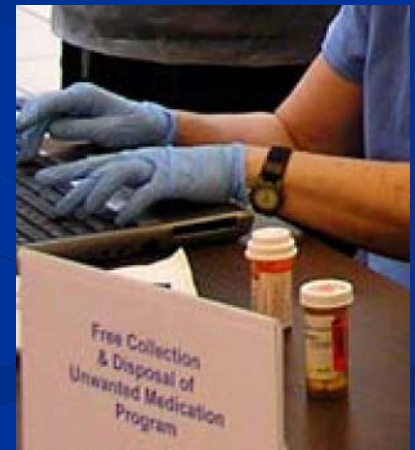
# Traffic Flow and Site Set-Up...

# What information should you collect?

Inventory of all Controlled Substances  
(minimum)



Community Survey



# Staffing the Collection

**Law Enforcement  
Pharmacist**

**Greeter  
Data Entry  
Drug Disposal Company**

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